

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

In Re: CHRISTOPHER C. NEAL

**CHAPTER 13
NO. 18-12411 JDW**

RESPONSE TO MOTION TO DISMISS

COMES NOW, Debtor, CHRISTOPHER C. NEAL, in the above styled and numbered cause, by and through undersigned counsel, and files this his Response to Motion to Dismiss, said Motion (Dkt. #68) having been filed by the Chapter 13 Trustee (“Trustee”), respectfully showing unto the Court as follows:

1. Debtor's construction business almost completely shut down in the time period between March 15, 2020 and the early part of May, 2020.
2. Debtor was able to pay a full plan payment on June 2, 2020; but it appears that although he is getting jobs, his projected income is lower over the rest of this year and possibly through a major part of next year, because of what happened to the economy.
3. Debtor will be filing a Motion to Suspend and a Motion to Modify his plan prior to a hearing on the Motion to Dismiss.

WHEREFORE, Debtor prays that this Court enter its Order denying the Motion to Dismiss and dismissing the same. Debtor prays for such other, further and general relief to which he may be entitled.

Respectfully Submitted,
CHRISTOPHER C. NEAL, Debtor

By: /s/ Robert Gambrell
ROBERT GAMBRELL, Attorney for Debtor
MSB #4409

CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtor, do hereby certify that the following have been served electronically via ECF the above Response to Motion to Dismiss to:

David W. Asbach, Acting U. S. Trustee
Locke D. Barkley, Chapter 13 Trustee
and to all parties that have entered an appearance requesting service via ECF

Dated this the 5th day of June, 2020.

/s/ Robert Gambrell
ROBERT GAMBRELL
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